

ATTACHMENT 1

SATCHER & MCGOVERN LLC

ATTORNEYS AT LAW

INVOICE

Georgia Department of Administrative Services c/o
Georgia Administrative Services

Attention: Carey Scruggs
1775 Spectrum Drive
Suite 100
Lawrenceville, GA 30043

Invoice # 545

File Number: 36335 / 002

Invoice Date: Wed, March 30, 2022

Re: DOAS/Jackson v. Eason et al., Claim No. LI12230152

Current Charges:

Fees

Date	Init.	Description	Hours	Rate	Amount
2/16/2022	ALM	Draft/revise and finalize witness list for trial.	0.5	125.00	62.50
2/24/2022	ALM	Initial draft/revision to pretrial order.	0.8	125.00	100.00
3/8/2022	ALM	Initial review of depositions and summaries of multiple corrections officers in prep for PTO/trial.	4.6	125.00	575.00
3/9/2022	ALM	Initial review of multiple inmate depositions and summaries in prep for PTO/trial.	3.9	125.00	487.50
3/11/2022	ALM	Initial review of disciplinary histories, institutional files and statements/report from incident in prep for PTO/trial.	3.9	125.00	487.50
3/14/2022	ALM	Initial review of depo of P. Stevenson in prep for PTO/trial.	2.8	125.00	350.00
3/15/2022	ALM	Review of MSJ ruling in preparation for PTO/limine.	1.1	125.00	137.50
3/15/2022	ALM	Initial review of depo of P. Jackson for PTO/trial.	3.2	125.00	400.00
3/15/2022	ALM	Review of additional officer depositions/summaries in prep for PTO/trial.	3.2	125.00	400.00
3/15/2022	TLL	Begin drafting defendant Eason's portion of the pretrial order.	3.0	125.00	375.00
3/15/2022	TLL	Finish the first draft of defendant Eason's portion of the proposed pretrial order.	3.2	125.00	400.00

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3/16/2022	ALM	Review of voluminous medical and inmate records in preparation for trial.	3.8	125.00	475.00
3/16/2022	ALM	Further review of video and deposition summaries in prep for trial/PTO.	2.6	125.00	325.00
3/17/2022	ALM	Initial review of client deposition in prep for trial/PTO.	2.8	125.00	350.00
3/17/2022	ALM	Further review of multiple inmate depositions/statements in prep for PTO/trial.	3.9	125.00	487.50
3/18/2022	ALM	Review of multiple documents including photos, statements, GBI report, policies etc in preparation for pretrial order.	2.9	125.00	362.50
3/18/2022	ALM	Draft/revision to pretrial order and conference with defense counsel regarding limines, charges, trial schedule, etc.	1.9	125.00	237.50
3/20/2022	TLL	Draft the first draft of defendant's motion in limine for trial.	2.9	125.00	362.50
3/21/2022	ALM	Draft/revision to proposed pretrial order, voir dire.	1.2	125.00	150.00
3/21/2022	ALM	Draft/revision to motions in limine.	0.9	125.00	112.50
3/21/2022	TLL	Review multiple emails from attorney general's office finalizing the pretrial order, with attachments and voir dire, exhibit list, and jury charges.	0.3	125.00	37.50
3/22/2022	ALM	Further review of Eason testimony and prep for trial examination.	1.8	125.00	225.00
3/22/2022	CSC	Revise Motion in Limine	0.3	50.00	15.00
3/22/2022	CSC	Work on DFT Eason's Proposed Trial Exhibit List	0.4	50.00	20.00
3/30/2022	ALM	Receipt/review of reset deadlines.	0.2	125.00	25.00

Fees for Services Rendered	56.1	\$6,960.00
Courtesy Discount		\$54.04
Total Fees after Discount		\$6,905.96

Total New Charges

\$6,905.96

Account Statement:

Balance as of Last Invoice	1,080.84
Payments and Adjustments	-1,080.84
Balance forward	0.00
Current Charges	6,905.96
Amount Due and Owing to Date	\$6,905.96

Payments:

Date	Description	Amount
3/30/2022	Payment #0616	1,080.84
	Total Payment	\$1,080.84

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ATTORNEYS AT LAW

INVOICE

Georgia Department of Administrative Services c/o
Georgia Administrative Services

Attention: Carey Scruggs
1775 Spectrum Drive
Suite 100
Lawrenceville, GA 30043

Invoice # 561

File Number: 36335 / 002

Invoice Date: Mon, April 25, 2022

Re: DOAS/Jackson v. Eason et al., Claim No. LI12230152-AWAITING TRIAL

Current Charges:

Fees

Date	Init.	Description	Hours	Rate	Amount
4/11/2022	ALM	Additional communications with counsel regarding in person meeting.	0.1	125.00	12.50
4/25/2022	ALM	Communicate with client Joshua Eason regarding upcoming trial.	0.3	125.00	37.50
4/25/2022	ALM	Communicate with DOAS regarding new trial date/pretrial order.	0.1	125.00	12.50
		Fees for Services Rendered	0.5		\$62.50

Total New Charges

\$62.50

Account Statement:

Balance as of Last Invoice	6,905.96
Current Charges	62.50
Amount Due and Owing to Date	\$6,968.46

SATCHER & MCGOVERN LLC

ATTORNEYS AT LAW

INVOICE

Georgia Department of Administrative Services c/o
Georgia Administrative Services

Attention: Carey Scruggs
1775 Spectrum Drive
Suite 100
Lawrenceville, GA 30043

Invoice # 625

File Number: 36335 / 002

Invoice Date: Fri, July 29, 2022

Re: DOAS/Jackson v. Eason et al., Claim No. LI12230152-AWAITING TRIAL

Current Charges:

Fees

Date	Init.	Description	Hours	Rate	Amount
7/14/2022	ALM	Communicate with counsel regarding meet and confer on PTO, etc.	0.2	125.00	25.00
7/16/2022	ALM	Initial review of deposition of plaintiff Jackson in preparation for cross examination at trial.	1.8	125.00	225.00
7/16/2022	ALM	Initial review of potential trial exhibits and potential updated medicals, convictions and other items needed for trial.	2.3	125.00	287.50
7/17/2022	ALM	Completion of review of deposition of plaintiff Jackson in initial trial preparation and outline of issues for cross-examination for trial, and further review of potential exhibits and updated documents regarding same.	3.9	125.00	487.50
7/17/2022	ALM	Initial preparation of timeline and damages issues and arguments in preparation for trial.	1.2	125.00	150.00
7/17/2022	ALM	Initial review of voluminous medicals of institutional plaintiffs in preparation for trial and correlate to damages case.	3.2	125.00	400.00
7/18/2022	ALM	Initial preparation of trial outline for witnesses and exhibits needed.	0.6	125.00	75.00

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7/18/2022	ALM	Further review of potential trial exhibits including SOPs, photos, GBI investigation, etc.	0.9	125.00	112.50
7/26/2022	ALM	Review of plaintiff Stevenson's deposition for trial preparation and initial outline of questions and exhibits for cross.	3.9	125.00	487.50
7/26/2022	ALM	Initial review of deposition of client Joshua Eason and begin outline regarding examination for trial regarding same.	1.6	125.00	200.00
7/26/2022	CSC	Preparation of comprehensive document/exhibit summary and preparation for trial.	3.8	50.00	190.00
7/26/2022	CSC	Begin summary of documents for use at trial/trial exhibits.	2.5	50.00	125.00
7/27/2022	ALM	Review of deposition testimony of client, Joshua Eason, and begin general outline for direct examination for trial.	3.2	125.00	400.00
7/27/2022	ALM	Complete review of deposition of client Joshua Eason and continue with additional prep for trial testimony.	1.9	125.00	237.50
7/27/2022	ALM	Initial review of deposition testimony of codefendant Catzaretto in preparation for trial.	1.6	125.00	200.00
7/28/2022	ALM	Review of lengthy transcript of lead defendant Catz in preparation for trial.	3.2	125.00	400.00
7/28/2022	ALM	Review of 30b6 depo of GDC rep in preparation for trial.	1.6	125.00	200.00
7/28/2022	ALM	Finish review of lengthy depo of Catz and initial outline of issues for trial.	1.6	125.00	200.00
7/28/2022	CSC	Continue reviewing file/documents and preparing exhibits and supportive documents for trial.	3.2	50.00	160.00
7/29/2022	ALM	Review of Henderson deposition regarding testimony on Eason and role, and initial outline for trial.	1.3	125.00	162.50

7/29/2022

ALM	Review of lengthy MSJ order and outline issues regarding evidence permitted at trial.	1.1	125.00	137.50
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Fees for Services Rendered	44.6	\$4,862.50
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Courtesy Discount		\$3.13
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Total Fees after Discount		\$4,859.37
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Total New Charges		\$4,859.37
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Account Statement:

Balance as of Last Invoice	6,968.46
Payments and Adjustments	-6,968.46
Balance forward	0.00
Current Charges	4,859.37
Amount Due and Owing to Date	\$4,859.37

Payments:

Date	Description	Amount
5/3/2022	Payment #0640	6,905.96
5/27/2022	Payment #0655	62.50
	Total Payment	\$6,968.46

SATCHER & MCGOVERN LLC

ATTORNEYS AT LAW

INVOICE

Georgia Department of Administrative Services c/o
Georgia Administrative Services

Attention: Carey Scruggs
1775 Spectrum Drive
Suite 100
Lawrenceville, GA 30043

Invoice # 643

File Number: 36335 / 002

Invoice Date: Wed, August 31, 2022

Re: DOAS/Jackson v. Eason et al., Claim No. LI12230152-AWAITING TRIAL

Current Charges:

Fees

Date	Init.	Description	Hours	Rate	Amount
8/5/2022	ALM	Further review of lengthy depo of Catz, lead defendant, in preparation for trial.	1.8	125.00	225.00
8/9/2022	ALM	Review and prepare outline for trial.	0.6	125.00	75.00
8/11/2022	ALM	Further review of exhibits for trial and expert deposition and potential testimony.	1.8	125.00	225.00
8/17/2022	ALM	Further review of witness depositions regarding references to Eason.	2.7	125.00	337.50
8/22/2022	ALM	Review of court instructions, pretrial order, exhibits, witnesses, limines and remaining evidentiary issues in preparation for court mandated conference with counsel tomorrow.	3.7	125.00	462.50
8/22/2022	ALM	Communications with counsel regarding exhibits and PTO for conference tomorrow.	0.3	125.00	37.50
8/22/2022	ALM	Review and prep for in person meeting per court order; review and prep of exhibits, witnesses, PTO, etc. and communicate with codefense counsel regarding same.	1.6	125.00	200.00
8/23/2022	CSC	Draft/finalize letter to Eason re trial and preparation for same	0.3	50.00	15.00

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8/23/2022	CSC	Email to DFT Eason re trial	0.2	50.00	10.00
8/23/2022	CSC	Reviewing documents and begin preparing/markings trial exhibits	1.9	50.00	95.00
8/23/2022	ALM	Meet and confer meeting with plaintiffs' and defense counsel per Court requirement; meet and address PTO, witnesses, exhibits, etc. and travel to and from same.	2.9	125.00	362.50
8/23/2022	ALM	Communicate with client Eason regarding upcoming trial.	0.3	125.00	37.50
8/24/2022	CSC	Continue preparing and marking trial exhibits	1.8	50.00	90.00
8/30/2022	CSC	Text messages with Joshua Eason	0.2	50.00	10.00
8/30/2022	ALM	Receipt/review of plaintiff's portion of pretrial order, voir dire, charges, etc.	1.6	125.00	200.00
8/30/2022	ALM	Communicate with client regarding trial preparation, issues, schedule.	0.8	125.00	100.00
Fees for Services Rendered			22.5		\$2,482.50

Expenses

Date	Description	Amount
8/23/2022	Postage	0.57
Total Fees & Expenses		\$2,483.07

Total New Charges**\$2,483.07***Account Statement:*

Balance as of Last Invoice	4,859.37
Current Charges	2,483.07
Amount Due and Owing to Date	\$7,342.44

SATCHER & MCGOVERN LLC

ATTORNEYS AT LAW

INVOICE

Georgia Department of Administrative Services c/o
Georgia Administrative Services

Attention: Carey Scruggs
1775 Spectrum Drive
Suite 100
Lawrenceville, GA 30043

Invoice # 659

File Number: 36335 / 002

Invoice Date: Fri, September 30, 2022

Re: DOAS/Jackson v. Eason et al., Claim No. LI12230152-AWAITING TRIAL

Current Charges:

Fees

Date	Init.	Description	Hours	Rate	Amount
8/31/2022	ALM	Communicate with DOAS regarding update on status of trial preparation.	0.2	125.00	25.00
9/1/2022	ALM	Communications with codefense counsel regarding PTO, plaintiff's portion, attachments.	0.4	125.00	50.00
9/2/2022	ALM	Further draft/revision to PTO and communications with counsel regarding finalizing same.	0.8	125.00	100.00
9/2/2022	ALM	Draft verdict form with numerous interrogatories on issues of excessive force, failure to intervene and damages for final pretrial order, and coordinate final changes to PTO with codefense counsel.	1.8	125.00	225.00
9/2/2022	ALM	Further draft/revision/finalize pretrial order/verdict forms in preparation for filing.	0.4	125.00	50.00
9/2/2022	ALM	Final communications with co-counsel and finalization of PTO.	0.3	125.00	37.50
9/7/2022	ALM	Receipt/review of communications with counsel regarding plaintiffs' trial exhibitis/receipt/review of plaintiffs' PTO filing.	0.6	125.00	75.00

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9/7/2022	CSC	Email exchange with Jennifer Jones/AG's paralegal re missing trial exhibits. (They have not yet gathered)	0.2	50.00	10.00
9/12/2022	ALM	Communications with counsel regarding court deadlines and exhibits not produced by plaintiff, strategy on response.	0.3	125.00	37.50
9/13/2022	ALM	Receipt/review of 105 exhibits from plaintiff's counsel to analyze evidentiary issues and objections for deadline Friday.	4.6	125.00	575.00
9/14/2022	ALM	Initial review of plaintiff's 108 exhibits and preparation of objections to same.	2.6	125.00	325.00
9/16/2022	ALM	Review of 105 exhibits proposed by plaintiffs for trial; review updates to evidentiary rules and prepare list of evidentiary objections for Court per deadline.	3.9	125.00	487.50
9/16/2022	ALM	Multiple communications with counsel regarding objections to trial exhibits.	0.1	125.00	12.50
9/16/2022	ALM	Further draft/revision to objections to 100+ exhibits from plaintiff, filed late and past the Court deadline. Preparation of cover letter to go with objections and communications with counsel regarding same.	2.7	125.00	337.50
9/16/2022	ALM	Final draft revision to objections to exhibits and cover letter to Court regarding same.	0.6	125.00	75.00
9/16/2022	CSC	Assist attorney with trial preparation	3.2	50.00	160.00
9/16/2022	CSC	Draft Objections Cover Page document	0.4	50.00	20.00
9/16/2022	CSC	Multiple revisions to Objections to PLFS Trial Exhibits	2.6	50.00	130.00
9/16/2022	CSC	Receive and cursory review of Plaintiff's Trial Exhibits	0.3	50.00	15.00

9/27/2022	ALM	Initial review of plaintiff's motion in limine and brief and objections to exhibits and initial outline and preparation of response to same.	1.6	125.00	200.00
		Fees for Services Rendered	27.6		\$2,947.50
		Courtesy Discount			\$124.50
		Total Fees after Discount			\$2,823.00

Total New Charges		\$2,823.00
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Account Statement:

Balance as of Last Invoice	7,342.44
Payments and Adjustments	-7,342.44
Balance forward	0.00
Current Charges	2,823.00
Amount Due and Owning to Date	\$2,823.00

Payments:

Date	Description	Amount
9/12/2022	Payment #0738 - CK#33109893 deposit date 09/06/22	4,859.37
9/30/2022	Payment #0746	2,483.07
	Total Payment	\$7,342.44

SATCHER & MCGOVERN^{LLC}

ATTORNEYS AT LAW

INVOICE

Georgia Department of Administrative Services c/o
Georgia Administrative Services

Attention: Carey Scruggs
1775 Spectrum Drive
Suite 100
Lawrenceville, GA 30043

Invoice # 678

File Number: 36335 / 002

Invoice Date: Wed, October 26, 2022

Re: DOAS/Jackson v. Eason et al., Claim No. LI12230152-AWAITING TRIAL

Current Charges:

Fees

Date	Init.	Description	Hours	Rate	Amount
9/23/2022	ALM	Draft/revision and review of codefendants response to plaintiff's motion in limine and draft/revise adoption of same.	0.1	125.00	12.50
9/30/2022	ALM	Draft/revision to motion incorporating response to plaintiff's motion in limine, draft/revision to response, and communications with AGs office regarding additional evidence.	0.8	125.00	100.00
9/30/2022	CSC	Additional revisions to Response in Opposition to Motion in Limine	1.4	50.00	70.00
10/3/2022	ALM	Receipt/review of motion and order for contraband for trial and communicate with AG regarding same.	0.5	125.00	62.50
10/4/2022	ALM	Receipt/review of order granting release of physical evidence.	0.2	125.00	25.00
10/4/2022	ALM	Initial review of mediation report and preparation of LLC comprehensive trial report.	0.9	125.00	112.50
10/4/2022	ALM	Receipt/review of plaintiff's response to motion in limine for Eason and Attical.	0.9	125.00	112.50

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10/5/2022	ALM	Review of pretrial filings/trial preparation materials and prepare comprehensive pretrial LLC report for large loss committee next week.	2.9	125.00	362.50
10/6/2022	CSC	Text message from/to Joshua Eason - confirming trial going forward	0.2	50.00	10.00
10/10/2022	ALM	Review of pretrial order, limines and responsive briefing, verdict forms, exhibit lists and objections, and final witness lists in initial preparation for pretrial conference.	2.1	125.00	262.50
10/10/2022	ALM	Review of amended complaint, discovery responses and disclosures in preparation for trial and PTC.	0.9	125.00	112.50
10/10/2022	ALM	Review of MSJ order and videos, photos and diagrams of event/riot in preparation for trial and PTC.	1.8	125.00	225.00
10/10/2022	ALM	Initial outline of direct examination of client Josh Eason and further review of deposition and exhibits in preparation of same.	2.4	125.00	300.00
10/10/2022	ALM	Initial outline of cross examination of Jackson in preparation for trial, refer to prior testimony to prepare same.	1.1	125.00	137.50
10/10/2022	ALM	Initial outline of cross examination of plaintiff Stevenson for trial, review of testimony in preparation of same.	0.9	125.00	112.50
10/10/2022	ALM	Initial outline/preparation of cross examination of other potential witnesses plaintiffs may call against Eason, especially inmate witnesses, including Briscoe, Cratic, Satterfield and Anderson.	2.1	125.00	262.50
10/10/2022	ALM	Initial outline of opening statement, structure for closing argument, consider issues for directed verdict.	2.6	125.00	325.00
10/10/2022	CSC	Assist attorney with trial preparation	2.6	50.00	130.00

10/11/2022	ALM	Communicate with AG regarding presentation of case, evidence, expected testimony and video.	0.5	125.00	62.50
10/11/2022	ALM	Review of declarations of plaintiffs and further revise cross examinations.	1.4	125.00	175.00
10/11/2022	ALM	Further preparation of opening statement.	1.1	125.00	137.50
10/11/2022	CSC	Text message Joshua Eason re trial prep	0.3	50.00	15.00
10/11/2022	CSC	Emails to Jennifer Jones/Co-DFT paralegal re trial evidence and videos	0.2	50.00	10.00
10/11/2022	CSC	Assist attorney with preparation for trial	3.7	50.00	185.00
10/11/2022	ALM	Further draft/revision to opening statement, rework and outline elements for close.	3.6	125.00	450.00
10/11/2022	CSC	Text message exchanges with Joshua Eason re trial preparation	0.2	50.00	10.00
10/12/2022	MBS	Research about venue of Statesboro Division of US District Court Southern Division, Judge Randal Hall, and several calls to Clerk's Office to learn information about potential jury pool.	1.3	125.00	162.50
10/12/2022	ALM	Further review of plaintiff Jackson's deposition, declaration and prep cross examination for trial.	3.6	125.00	450.00
10/12/2022	ALM	Appear for attend LLC to obtain permission to proceed to trial, present case as to Eason.	0.9	125.00	112.50
10/12/2022	ALM	Initial review of law regarding potential directed verdict for Eason, begin outline of same.	0.8	125.00	100.00
10/12/2022	ALM	Review of Stevenson's deposition and declaration and further preparation of cross-examination for trial.	2.4	125.00	300.00
10/12/2022	CSC	Email Joshua Eason/client with videos for review	0.2	50.00	10.00

10/13/2022	ALM	Review of inmate testimony in preparation for cross examination should they appear at trial, including Cedric Neely and William Pate.	3.9	125.00	487.50
10/14/2022	ALM	Review of depositions of inmates/potential trial witnesses Cratic and Anderson.	3.8	125.00	475.00
10/17/2022	ALM	Further review of client testimony and trial exhibits and further preparation for direct examination and prep him for cross at trial.	3.6	125.00	450.00
10/17/2022	ALM	Further review of testimony and exhibits and prepare client for trial testimony.	2.8	125.00	350.00
10/17/2022	ALM	Receipt/review of plaintiff's proposed motion for continuance for trial and communications with codefense counsel regarding same.	0.4	125.00	50.00
10/17/2022	ALM	Efforts to review and play stationary camera video for trial presentation.	0.6	125.00	75.00
10/17/2022	CSC	Assist attorney re trial prep exhibits	0.6	50.00	30.00
10/18/2022	ALM	Further review of exhibits and incorporate into direct examination of Eason and further preparations of same, including review/evaluation of video.	3.6	125.00	450.00
10/18/2022	CSC	Telephone call to Lisa Weider/Judge's Clerk re trial calendar	0.2	50.00	10.00
10/18/2022	ALM	Further update and review of cross exams of plaintiff's and incorporate into open and close.	1.2	125.00	150.00
10/18/2022	ALM	Review of PTO, exhibits, etc. in preparation for PTC tomorrow.	0.8	125.00	100.00
10/18/2022	ALM	Conference with client and preparation for testimony.	0.9	125.00	112.50
10/18/2022	ALM	Receipt/review of order continuing trial and communicate with client regarding same.	0.3	125.00	37.50

10/26/2022	ALM	Receipt/review of new trial setting, contact DOAS and client regarding same.	0.3	125.00	37.50
		Fees for Services Rendered	67.6		\$7,730.00
		Courtesy Discount			\$141.15
		Total Fees after Discount			\$7,588.85

Total New Charges		\$7,588.85
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Account Statement:

Balance as of Last Invoice	2,823.00
Payments and Adjustments	-2,823.00
Balance forward	0.00
Current Charges	7,588.85
Amount Due and Owing to Date	\$7,588.85

Payments:

Date	Description	Amount
10/26/2022	Payment #0783	2,823.00
	Total Payment	\$2,823.00

SATCHER & MCGOVERN LLC

ATTORNEYS AT LAW

INVOICE

Georgia Department of Administrative Services c/o
Georgia Administrative Services

Attention: Carey Scruggs
1775 Spectrum Drive
Suite 100
Lawrenceville, GA 30043

Invoice # 762

File Number: 36335 / 002

Invoice Date: Tue, February 28, 2023

Re: DOAS/Jackson v. Eason et al., Claim No. LI12230152-AWAITING TRIAL

Current Charges:

Fees

Date	Init.	Description	Hours	Rate	Amount
1/25/2023	ALM	Receipt/review of motion for miscellaneous relief.	0.2	125.00	25.00
1/26/2023	ALM	Receipt/review of notice of pretrial conference.	0.1	125.00	12.50
1/26/2023	CSC	Review/summary of Court's new conference and trial dates	0.3	50.00	15.00
1/26/2023	ALM	Receipt/review of court orders for witness production and scheduling for trial.	0.2	125.00	25.00
1/30/2023	ALM	Begin review of inmate testimony for inmates plaintiff sought to produce at trial in recent filing, in order to prepare for testimony in March trial (no requests to produce inmates for prior trial setting).	3.6	125.00	450.00
2/1/2023	ALM	Further review of newly identified witnesses by plaintiffs and review of deposition testimony of multiple witnesses to evaluate questioning needed by client Eason.	3.9	125.00	487.50
2/1/2023	ALM	Receipt/review of plaintiffs' supplemental limine to exclude crimes of inmate witnesses.	0.6	125.00	75.00
2/1/2023	ALM	Draft/revision to correspondence to client regarding trial preparations.	0.3	125.00	37.50

SATCHER & MCGOVERN, LLC. | 288 S. MAIN STREET, SUITE 100, ALPHARETTA, GA 30009

2/1/2023	CSC	Draft letter to client regarding new trial date and request dates for trial prep	0.3	50.00	15.00
2/1/2023	CSC	Receive and review PLF Jackson's supplement to motion in limine	0.2	50.00	10.00
2/2/2023	ALM	Further review of deposition of inmate Cedric Neely and preparation for trial examination.	2.8	125.00	350.00
2/2/2023	ALM	Review of inmate Cratic deposition and preparation of examination for trial.	1.8	125.00	225.00
2/2/2023	ALM	Receipt/review of plaintiff's additional motion in limine and initial outline of response to same.	0.8	125.00	100.00
2/2/2023	ALM	Communicate with plaintiff's counsel regarding accepting service of subpoena for client's testimony.	0.2	125.00	25.00
2/2/2023	CSC	Revise letter to client regarding upcoming dates	0.1	50.00	5.00
2/2/2023	CSC	Email to client with correspondence regarding trial and preparation for same; Text message exchange with Mr. Eason	0.3	50.00	15.00
2/3/2023	ALM	Further review of potential plaintiff witness testimony and preparation for same, including preparation outline for client on cross.	3.6	125.00	450.00
2/3/2023	ALM	Communicate with client regarding trial preparation.	0.3	125.00	37.50
2/6/2023	ALM	Receipt/review of plaintiffs' additional pleadings regarding procuring additional inmate witnesses, intent to use depositions for those claiming unavailable.	0.3	125.00	37.50
2/6/2023	CSC	Text message exchanges with client regarding work schedule and week of trial	0.2	50.00	10.00
2/7/2023	ALM	Receipt/review plaintiff's motion in limine for Stevenson.	0.7	125.00	87.50
2/8/2023	CSC	Receive and review additional motions in limine and supplements	0.3	50.00	15.00

2/9/2023	ALM	Receipt/review of additional motions in limine from plaintiffs.	0.8	125.00	100.00
2/9/2023	ALM	Communications with defense counsel and plaintiff's counsel regarding PTO and meet and confer requirement.	0.3	125.00	37.50
2/9/2023	ALM	Conference call with defense counsel regarding limines and PTO.	0.5	125.00	62.50
2/10/2023	CSC	Cursory review of several motions and responses filed by Plaintiff	0.4	50.00	20.00
2/10/2023	ALM	Additional communications with counsel regarding finalizing pretrial order and limine issues.	0.4	125.00	50.00
2/10/2023	ALM	Review of Briscoe and Pate inmate depositions based on plaintiff's request to bring live to trial; initial outline of issues/questions for cross at trial.	3.9	125.00	487.50
2/13/2023	ALM	Communicate with codefense counsel regarding pretrial order and confer and meet requirement.	0.2	125.00	25.00
2/14/2023	ALM	Additional communications between counsel regarding final edits and revisions to PTO.	0.5	125.00	62.50
2/15/2023	ALM	Multiple communications from plaintiff's counsel regarding pretrial order changes and witnesses and subsequent communications among defense counsel regarding same.	0.6	125.00	75.00
2/15/2023	ALM	Draft/revise and finalize pretrial order and communicate with codefense counsel regarding same.	0.8	125.00	100.00
2/15/2023	ALM	Further communications with codefense counsel and finalization of PTO.	0.3	125.00	37.50
2/16/2023	ALM	Receipt/review of plaintiff's pretrial order portions and punitive damages argument.	0.8	125.00	100.00
2/17/2023	CSC	Receive PLFs supplement to amended motion in limine; Review Courts Order regarding due dates	0.3	50.00	15.00

2/21/2023	ALM	Receipt/review additional motion in limine to exclude all testimony evidence regarding anything but two moments with Jackson and Stevenson.	0.6	125.00	75.00
2/22/2023	ALM	Receipt/review of filing of video/motion regarding same.	0.1	125.00	12.50
2/23/2023	ALM	Receipt/.review of subpoena for Cratic to testify.	0.1	125.00	12.50
2/23/2023	ALM	Communications with codefense counsel regarding motions in limine responses.	0.3	125.00	37.50
2/26/2023	ALM	Further review of inmate proposed deposition testimony in reference to motion in limine as it relates to Eason.	3.5	125.00	437.50
2/27/2023	ALM	Additional supplemental motion in limine by plaintiff.	0.5	125.00	62.50
2/27/2023	CSC	Receive and review amended motion in limine	0.2	50.00	10.00
2/28/2023	ALM	Additional communications with plaintiff's counsel regarding trial witnesses and with DOAS regarding trial.	0.3	125.00	37.50
2/28/2023	ALM	Further review of multiple limines and cross reference with exhibits and testimony to determine response on behalf of defendant Eason, begin preparation of same.	2.8	125.00	350.00

**Fees for Services
Rendered**

39.3

\$4,717.50

Courtesy Discount

\$379.44

Total Fees after Discount

\$4,338.06

Total New Charges

\$4,338.06

Account Statement:

Balance as of Last Invoice	7,588.85
Payments and Adjustments	-7,588.85
Balance forward	0.00
Current Charges	4,338.06
Amount Due and Owing to Date	\$4,338.06

Payments:

Date	Description	Amount
11/18/2022	Payment #0814- CK #33132955 Deposit Date 11/10	7,588.85
	Total Payment	<hr/> \$7,588.85

SATCHER & MCGOVERN LLC

ATTORNEYS AT LAW

INVOICE

Georgia Department of Administrative Services c/o
Georgia Administrative Services

Attention: Carey Scruggs
1775 Spectrum Drive
Suite 100
Lawrenceville, GA 30043

Invoice # 778

File Number: 36335 / 002

Invoice Date: Sun, March 26, 2023

Re: DOAS/Jackson v. Eason et al., Claim No. LI12230152-AWAITING TRIAL

Current Charges:

Fees

Date	Init.	Description	Hours	Rate	Amount
3/1/2023	ALM	Draft/revision to responses to plaintiff's multiple motions in limine.	0.7	125.00	87.50
3/1/2023	ALM	Communications with codefense counsel regarding finalizing limine responses.	0.2	125.00	25.00
3/2/2023	ALM	Final review of inmate testimony to evaluate objections to transcripts if permitted to read to jury and communicate with codefense counsel regarding same.	2.9	125.00	362.50
3/3/2023	CSC	Review of several motions and objections to trial evidence filed by plaintiffs and objections filed by co-defendants	0.5	50.00	25.00
3/3/2023	CSC	Draft/finalize DFT Eason's objections to deposition designations and counter-designations of plaintiffs	0.8	50.00	40.00
3/4/2023	ALM	Review of deposition testimony and prepare for potential questions at trial for witnesses Catanzariti, Attical.	3.8	125.00	475.00
3/4/2023	ALM	Review of multiple recent limines/responses, revised pretrial order, verdict forms and charges in initial preparation for upcoming pretrial conference.	1.9	125.00	237.50

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3/6/2023	CSC	Receive and review 2 videos provided by PLF as trial evidence; Receive and review PLFs updated additional exhibits for trial	1.6	50.00	80.00
3/6/2023	ALM	Review of plaintiff Jackson transcript and rework cross examination in light of recent proceedings.	2.3	125.00	287.50
3/6/2023	ALM	Review of Stevenson transcript and rework cross examination in light of recent proceedings.	1.7	125.00	212.50
3/8/2023	ALM	Review of client's transcript and rework and prepare direct examination for trial.	3.2	125.00	400.00
3/8/2023	ALM	Prepare for client preparation session for trial including outline for direct, cross by plaintiffs and issues to address.	1.8	125.00	225.00
3/8/2023	ALM	Meet with client in preparation for trial and revise direct following same.	2.8	125.00	350.00
3/9/2023	CSC	Email to J. Eason/client with Notice of Hearing and Scheduling Order	0.2	50.00	10.00
3/10/2023	ALM	Receipt/review of plaintiff's trial exhibits and writs for plaintiffs' attendance at trial.	2.1	125.00	262.50
3/11/2023	ALM	Review of deposition of inmate Pate and prepare for cross. Review of transcripts of Briscoe, Thomas, Ritchie, Watkins and Pittman to address testimony on Eason.	3.9	125.00	487.50
3/12/2023	ALM	Review of transcripts of Anderson, Atherton, Cratic, Satterfield for impact on Eason case and potential questions.	3.8	125.00	475.00
3/13/2023	ALM	Review and prepare defense exhibits needed for trial and review and prep corresponding limines from P in preparation for pretrial conference.	2.3	125.00	287.50

3/13/2023	ALM	Review plaintiff's updated exhibit list and prepare for same; also review plaintiff's RFAs on Eason for potential use at trial. Review and prepare for argument on motions regarding Ps use of deposition transcripts and other objections to exhibits.	3.4	125.00	425.00
3/13/2023	ALM	Review of video in preparation for trial.	1.1	125.00	137.50
3/13/2023	ALM	Review of transcripts of Attical, Harrison, Davis and Hill for impact on Eason testimony and potential questions for trial.	3.9	125.00	487.50
3/14/2023	ALM	Further review of videos for trial prep and depositions of inmate witnesses.	2.9	125.00	362.50
3/14/2023	CSC	Assist attorney with additional trial preparations regarding plaintiff's new/updated trial exhibits	1.3	50.00	65.00
3/14/2023	ALM	Review of numerous depositions by plaintiffs and responses in preparation for pretrial conference.	2.9	125.00	362.50
3/14/2023	ALM	Further review of inmate and witness testimony and prep for trial.	3.4	125.00	425.00
3/15/2023	ALM	Travel to Statesboro to prep client for trial and for pretrial conference.	4.4	125.00	550.00
3/15/2023	ALM	Meet with client Eason to review videos, photos, trial exhibits and prepare for testimony when called in Ps case and direct and cross in defense case.	3.5	125.00	437.50
3/15/2023	ALM	Communications with counsel regarding trial subpoenas.	0.1	125.00	12.50
3/15/2023	ALM	Communications with codefense counsel regarding trial exhibits and pretrial conference.	0.5	125.00	62.50
3/15/2023	ALM	Receipt/review of multiple subpoena filings from plaintiff's counsel for trial.	0.2	125.00	25.00
3/15/2023	CSC	Receipt and cursory review of multiple subpoenas filed by PLFS	0.1	50.00	5.00

3/15/2023	CSC	Telephone call and letter to Judge Hall's Clerk, Lisa Widener, with flashdrive containing digital trial exhibits for Eason per Court Order	0.4	50.00	20.00
3/16/2023	ALM	Appear for attend pretrial conference.	2.1	125.00	262.50
3/16/2023	ALM	Communicate with client and DOAS regarding PTC and trial continuance for competency determination of plaintiff.	0.6	125.00	75.00
3/16/2023	ALM	Return travel from Statesboro for PTC.	4.4	125.00	550.00
3/17/2023	CSC	Receipt and cursory review of additional trial documents filed by PLFS	0.2	50.00	10.00
3/17/2023	CSC	Receipt and review of Court's rescheduling notice re pretrial conference and notice re trial date set for June 2023	0.2	50.00	10.00
3/17/2023	ALM	Receipt review of supplemental authority and filings regarding competency petition by plaintiff's counsel and communicate with counsel for defense regarding same.	0.9	125.00	112.50
3/18/2023	ALM	Communications with plaintiff's counsel regarding process for competency evaluation.	0.2	125.00	25.00
3/20/2023	ALM	Receipt/review of reset deadlines regarding competency exam.	0.1	125.00	12.50
3/21/2023	ALM	Receipt/review of plaintiff's first report and filings for competency evaluation of plaintiff.	0.3	125.00	37.50
3/22/2023	ALM	Receipt/review of second status report/update regarding evaluation of Stevenson for competency at trial.	0.3	125.00	37.50

3/23/2023	ALM	Reciept/review of draft response to plaintiff filings regarding competency and supplemental authority for limine; draft/revise and communicate with codefense counsel regarding same.	0.4	125.00	50.00
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Fees for Services Rendered	74.3	\$8,890.00
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Courtesy Discount		\$216.90
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Total Fees after Discount		\$8,673.10
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Expenses

Date	Description	Amount
3/15/2023	Postage - to Southern District	41.43
3/16/2023	Meals during stay for PTC.	36.01
3/16/2023	Travel to and from Statesboro, GA for pretrial conference.	305.23
3/16/2023	Lodging and area for trial prep meeting for pretrial conference and trial prep.	293.59
	Total Expenses	\$676.26

Total Fees & Expenses	\$9,349.36
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Total New Charges	\$9,349.36
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Account Statement:

Balance as of Last Invoice	4,338.06
Payments and Adjustments	-4,338.06
Balance forward	0.00
Current Charges	9,349.36
Amount Due and Owing to Date	\$9,349.36

Payments:

Date	Description	Amount
3/17/2023	Payment #0898	4,338.06
	Total Payment	\$4,338.06

SATCHER & MCGOVERN LLC

ATTORNEYS AT LAW

INVOICE

Georgia Department of Administrative Services c/o
Georgia Administrative Services

Attention: Carey Scruggs
1775 Spectrum Drive
Suite 100
Lawrenceville, GA 30043

Invoice # 824

File Number: 36335 / 002

Invoice Date: Thu, June 1, 2023

Re: DOAS/Jackson v. Eason et al., Claim No. LI12230152-AWAITING TRIAL

Current Charges:

Fees

Date	Init.	Description	Hours	Rate	Amount
3/28/2023	ALM	Receipt/review of plaintiff's third status report on evaluation of Stevenson and reply to defendant's response.	0.2	125.00	25.00
4/7/2023	ALM	Receipt/review of updated report by plaintiff regarding competency.	0.3	125.00	37.50
4/11/2023	ALM	Communications with counsel regarding competency report.	0.2	125.00	25.00
4/25/2023	ALM	Multiple communications regarding guardian appointment, failure of plaintiff to provide report.	0.3	125.00	37.50
5/10/2023	ALM	Communications with codefense counsel regarding upcoming pretrial conference.	0.2	125.00	25.00
5/11/2023	ALM	Several communications with co-defense counsel regarding issues with use of transcript of Stevenson in lieu of testimony due to incompetency and motions for pretrial next week.	0.6	125.00	75.00
5/15/2023	CSC	Draft/revise/finalize Motion for Continuance of Pretrial Conference and proposed Order	1.2	50.00	60.00
5/17/2023	ALM	Communications from court regarding reset deadlines.	0.1	125.00	12.50

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5/22/2023	ALM	Review of filing for pretrial, communicate with counsel regarding same.	0.3	125.00	37.50
5/26/2023	ALM	Review of Stevenson deposition for trial as will likely be read into evidence based on incompetency of plaintiff; draft revision to objections to portions of testimony and communicate with codefense counsel regarding same.	2.9	125.00	362.50
5/26/2023	ALM	Receipt/review of plaintiff's updated motion and witness list for upcoming pretrial conference; review of same and further preparation based on updated pleadings for upcoming pretrial order.	1.6	125.00	200.00
5/26/2023	ALM	Further revision to client examinations, open, close based on incorporating deposition testimony only for plaintiff Stevenson based on incompetency for trial.	1.6	125.00	200.00
5/29/2023	ALM	Further review of witness lists and prep for testimony of plaintiff's witnesses based on updated will call list.	3.9	125.00	487.50
5/30/2023	CSC	Draft Notice of Change of Address	0.5	50.00	25.00
5/30/2023	ALM	Communicate with client regarding trial prep.	0.2	125.00	25.00
5/31/2023	ALM	Plan and prepare for upcoming pretrial conference.	1.6	125.00	200.00
5/31/2023	ALM	Further preparation for meeting with client Eason to prep for trial.	0.9	125.00	112.50
5/31/2023	ALM	Further preparation for trial--opening and closing.	1.8	125.00	225.00
6/1/2023	ALM	Travel to Augusta for pretrial conference to take place the following morning.	3.1	125.00	387.50
Fees for Services Rendered			21.5		\$2,560.00
Courtesy Discount					\$467.47
Total Fees after Discount					\$2,092.53

Expenses

Date	Description	Amount
5/31/2023	Prepayment for reservation for 4 night stay in Statesboro for upcoming trial. ; Hotel	878.39
6/1/2023	Hotel for federal Pretrial Conference the next morning.	251.00
6/1/2023	Travel to Augusta for morning pretrial conference next day, and return travel following conference (169 miles ea. way).; Travel	221.39

Total Expenses**\$1,350.78****Total Fees & Expenses****\$3,443.31****Total New Charges****\$3,443.31***Account Statement*

Balance as of Last Invoice	9,349.36
Payments and Adjustments	-9,349.36
Balance forward	0.00
Current Charges	3,443.31
Amount Due and Owing to Date	\$3,443.31

Payments:

Date	Description	Amount
4/26/2023	Payment #0933- CK 33183530 Deposit Date 04/20/23	9,349.36
	Total Payment	\$9,349.36

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ATTORNEYS AT LAW

INVOICE

Georgia Department of Administrative Services c/o
Georgia Administrative Services

Attention: Carey Scruggs
1775 Spectrum Drive
Suite 100
Lawrenceville, GA 30043

Invoice # 840

File Number: 36335 / 002

Invoice Date: Mon, June 19, 2023

Re: DOAS/Jackson v. Eason et al., Claim No. LI12230152-AWAITING TRIAL

Current Charges:

Fees

Date	Init.	Description	Hours	Rate	Amount
6/2/2023	ALM	Return travel from pretrial conference in Augusta.	3.6	125.00	450.00
6/5/2023	ALM	Further draft/revision to opening for trial.	2.3	125.00	287.50
6/5/2023	ALM	Further draft/revision to cross examination of Jackson for trial and pull potential impeachment excerpts/and declaration.	1.9	125.00	237.50
6/5/2023	ALM	Final review of Satterfield transcript and prep for cross examination at trial.	1.6	125.00	200.00
6/5/2023	ALM	Further review of Cratic deposition and preparation for cross examination at trial.	2.8	125.00	350.00
6/5/2023	ALM	Further review of Anderson deposition and final prep of cross examination at trial.	1.4	125.00	175.00
6/5/2023	ALM	Receipt/review of plaintiffs' will call witness list and communications with counsel regarding same.	0.4	125.00	50.00
6/5/2023	ALM	Receipt/review of plaintiffs' designations of Stevenson deposition for use at trial.	0.3	125.00	37.50
6/6/2023	ALM	Further draft/revision to finalize direct examination of client Eason, review of potential exhibits, evaluate important deposition testimony and create practice cross-examination.	2.9	125.00	362.50

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6/6/2023	ALM	Initial outline for closing argument including outline of claims against client, purported testimony and evidence.	1.6	125.00	200.00
6/6/2023	ALM	Further review of inmate deposition testimony for trial.	1.9	125.00	237.50
6/6/2023	ALM	Conference with client to run through direct and cross examination and general info regarding trial.	1.9	125.00	237.50
6/7/2023	ALM	Reciept/review of plaintiffs' proposed jury charges and initial evaluation of same.	1.4	125.00	175.00
6/7/2023	ALM	Review and evaluation of final designations/objections and edited deposition transcript of Stevenson for trial in light of his incompetency to testify.	1.6	125.00	200.00
6/8/2023	ALM	Further draft/revision to examination of Cedric Neely.	1.3	125.00	162.50
6/8/2023	ALM	Further draft examinations of witnesses Henderson, Hill, Satterfield.	1.8	125.00	225.00
6/8/2023	ALM	Prepare mock cross to prepare client.	1.7	125.00	212.50
6/8/2023	ALM	Prepare draft examination of Anderson for trial.	1.5	125.00	187.50
6/8/2023	ALM	Further draft revision to opening and client exams.	2.4	125.00	300.00
6/9/2023	CSC	Assist attorney with trial prep	0.4	50.00	20.00
6/9/2023	ALM	Review transcript of Pate and prep cross examination.	1.9	125.00	237.50
6/9/2023	ALM	Review transcript of inmate Briscoe and prepare cross-examination.	1.6	125.00	200.00
6/9/2023	ALM	Review transcript of Cedric Neely and prepare final cross examination.	1.3	125.00	162.50
6/9/2023	ALM	Prep meeting with client and prepare for cross in plaintiff's case and defense.	1.4	125.00	175.00
6/9/2023	ALM	Review of exhibits for plaintiff's and defense, review videos and photos, and make final determinations regarding use at trial.	2.9	125.00	362.50

6/9/2023	ALM	Prepare outline of examination on potential issues with CO witnesses.	0.8	125.00	100.00
6/10/2023	ALM	Further review of testimony of inmate witnesses Briscoe, Neely in preparation for cross examination.	2.3	125.00	287.50
6/10/2023	ALM	Further review of DOC witnesses and both experts to finalize potential questions/issues impacting Eason.	1.1	125.00	137.50
6/10/2023	ALM	Outline legal issues for directed verdict.	0.8	125.00	100.00
6/10/2023	ALM	Final review of evidence/exhibits for trial preparation.	0.8	125.00	100.00
6/11/2023	ALM	Final prep for opening, closing and evidentiary issues for trial.	1.6	125.00	200.00
6/11/2023	ALM	Review of rulings on evidence and plaintiffs' recently submitted jury charges.	0.9	125.00	112.50
6/11/2023	ALM	Further review of Jackson transcript and final preparation of cross.	1.1	125.00	137.50
6/11/2023	ALM	Final review of client Eason deposition and preparation for direct.	1.2	125.00	150.00
6/11/2023	ALM	Travel to Statesboro for trial beginning following morning.	4.5	125.00	562.50
6/12/2023	ALM	Appear for attend trial/appear for hearing upon learning counsel seeks to drop Eason; argue for and obtain judgment rather than dismissal.	1.9	125.00	237.50
6/12/2023	ALM	Communicate with DOAS regarding judgments and status of trial.	0.5	125.00	62.50
6/12/2023	ALM	Return travel from Statesboro, Georgia.	4.5	125.00	562.50
6/13/2023	ALM	Initial review of law regarding Rule 11 sanctions, costs and fees as well as attorney's fees caselaw and analysis.	3.4	125.00	425.00
6/16/2023	ALM	Receipt/review of verdict/PTO/ and final documents filed by Court at conclusion of trial.	0.6	125.00	75.00

6/16/2023	ALM	Communications with AG regarding trial and strategy for pursuing fees and costs. Further review of law regarding federal statute regarding same.	1.4	125.00	175.00
6/19/2023	ALM	Further review of law regarding inherent authority for sanctions and USC 1927 on finding of protracting litigation.	1.8	125.00	225.00
6/19/2023	ALM	Review of bill of costs and initial preparation of same.	0.8	125.00	100.00
Fees for Services Rendered			73.8		\$9,195.00

Expenses

Date	Description	Amount
6/2/2023	Meals for travel to Augusta for Pretrial conference.	31.39
6/12/2023	Meals Sunday and Monday (5) for travel to and from Statesboro, Georgia and appearance for trial.	86.00
6/13/2023	Travel to and from federal courthouse in Statesboro, GA for trial.	306.54
Total Expenses		\$423.93
Total Fees & Expenses		\$9,618.93
Total New Charges		\$9,618.93

Account Statement:

Balance as of Last Invoice	3,443.31
Current Charges	9,618.93
Amount Due and Owing to Date	\$13,062.24